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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

**CENTER FOR BIOLOGICAL
DIVERSITY,**

Plaintiff,

v.

**U.S. FISH AND WILDLIFE
SERVICE, et al.**

Defendants.

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Case No. CV-21-144-DWM

Judge Donald W. Molloy

JOINT MOTION TO EXTEND STAY

OF PROCEEDINGS

Plaintiff Center for Biological Diversity (“Center”) and Federal Defendants the United States Fish and Wildlife Service (“Service”); Martha Williams, in her official capacity as Director of the Service; the United States Department of the Interior; and Debra Haaland, in her official capacity as Secretary of the Interior, hereby jointly provide this status report and request a three-month extension of the stay of proceedings until October 5, 2022.

The Center filed this lawsuit in December 2021, challenging the Service’s Final 2020-2021 Station-Specific Hunting and Sport Fishing Rule. Dkt. 1. Based on the parties’ need to focus on settlement communications, the case has been stayed through July 5, 2022. Dkts. 11, 17.

During the stay, Plaintiff and Federal Defendants have exchanged multiple offers and counteroffers. Most recently, Federal Defendants provided Plaintiff a detailed counteroffer on June 23, 2022, which the parties discussed on June 24, 2022. The parties are optimistic that they can settle this case, as they have reached a tentative agreement in principle on key terms and will now turn to drafting the written settlement agreement and seeking necessary approvals.

To allow these productive settlement efforts to continue, the parties request an extension of the stay to October 5, 2022. If granted, the parties will file a joint status report on or before that date, to update the Court as to the status of the settlement agreement.

This three-month extension will also allow time for the Service to finalize its

2022-2023 Station-Specific Hunting and Sport Fishing Rule (the rule the Service issues annually that describes changes for hunting and fishing on the National Wildlife Refuge System). The Service anticipates submitting the final rule to the Office of the Federal Register by the end of September 2022. Extending the stay until after publication of the final rule would allow Plaintiff time to determine if the Service's final rule satisfies some of the Center's goals of this litigation, which would further facilitate settlement of the case.

For the foregoing reasons, the parties jointly and respectfully request entry of the proposed order attached.

DATED: June 27, 2022

/s/ Camila Cossío

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